

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) CR No.: 04-10098-WGY
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)
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v.)
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)
CARMEN FIGUEROA,)
Defendant)

MOTION TO CONTINUE SENTENCING

NOW COMES, Carmen Figueroa, the Defendant in the above-captioned matter and moves to continue her sentencing hearing from Thursday, March 30, 2006 to either Monday, May 1, 2006; Tuesday, May 2, 2006; Wednesday, May 3, 2006 and / or another date convenient to this Court.

In support of this motion, counsel for the defendant states as follows:

1. Counsel had been on trial in a first degree murder case involving the death of former priest John Geoghan. This case lasted three (3) weeks but required months of preparation.
2. Counsel has just finished a federal extortion trial before this Court which began February 27, 2006.
3. Counsel is currently preparing for a first degree murder trial beginning March 22, 2006 in the Middlesex Superior Court, Commonwealth v. Taylor which will almost certainly prevent counsel from being present on the scheduled date of March 30, 2006.
4. Counsel is not adequately prepared for this matter. Counsel seeks additional time to prepare a sentencing memorandum to advance both downward departure issues and statutory sentencing concerns.

5. The additional time is in the interest of justice.

Respectfully submitted,
CARMEN FIGUEROA
By her Attorney;

Dated: March 15, 2006

/s/ John LaChance
John H. LaChance, Esquire
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CERTIFICATE OF SERVICE

I, John H. LaChance, Esq., do hereby certify that I have served a copy of the foregoing upon the government by means of the CMECF System upon Assistant United States Attorney Susan Postwistillo located at the Office of the District Attorney, One Courthouse Way, Suite 9200, Boston, MA 02110 on this 15th day of March, 2006.

s/s John LaChance
John LaChance, Esquire